

SCHLAM STONE & DOLAN LLP  
David J. Goldsmith  
26 Broadway, 19th Fl.  
New York, NY 10004  
(212) 344-5400  
(212) 344-7677 (fax)  
dgoldsmith@schlamstone.com

*Attorneys for Plaintiff Shannon Reilly a/k/a Everett Reilly*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SHANNON REILLY a/k/a EVERETT  
REILLY

*Plaintiff,*

v.

LISA FILIPPINI, DIANA KEMP and  
LISA'S PRICELESS PETS, LLC.

*Defendants.*

No. 2:24-cv-08208- KSH-AME

**DECLARATION OF DAVID J.  
GOLDSMITH IN SUPPORT OF  
PLAINTIFF'S REQUEST FOR  
CERTIFICATE OF ENTRY OF  
DEFAULT**

My name is David J. Goldsmith. I am fully competent to make this declaration and the following statements are based on my personal knowledge and are true and correct:

1. I am an attorney-at-law licensed in the State of New Jersey. I am a member of Schlam Stone & Dolan LLP, counsel for Plaintiff Shannon Reilly. As such, I am fully familiar with this action.
2. I submit this Declaration in support of Shannon Reilly's Request for a Certificate of Default against Defendant Lisa's Priceless Pets, LLC ("Priceless Pets").
3. The above-entitled action was brought for federal and state law wage and hour violations

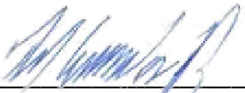
and breach of contract.

4. It was commenced by personal service of a Summons and Complaint (collectively “Complaint”) upon Lisa’s Priceless Pets LLC (“Priceless Pets”) on August 8, 2024 (see Dkt. No. 1 and Dkt. No. 4).
5. On August 23, 2024, Michael Chong, Esq. appeared as counsel for all three defendants in this matter, including Priceless Pets (*see* Dkt. No. 7).
6. On January 23, 2025, Michael Chong, Esq. moved to withdraw as attorney for all three defendants, including Priceless Pets (*see* Dkt. No. 21).
7. On April 2, 2025, following a hearing attended by all parties, the Court granted Michael Chong’s motion to withdraw as attorney for all defendants, noting that: “the Court wishes to make clear that while individual defendants Lisa Filippini and Diana Kemp may proceed *pro se* if they choose not to retain new counsel, ***defendant Lisa’s Priceless Pets is a limited liability company and may therefore appear in federal court only through licensed counsel***, *see Rowland v. Cal. Men’s Colony*, 506 U.S. 194, 201-02 (1993); *Dougherty v. Snyder*, 469 F. App’x 71, 72 (3d Cir. 2012); *United States v. Cocivera*, 104 F.3d 566, 572 (3d Cir. 1996)” and “**ORDERED** that as to Defendant Lisa’s Priceless Pets, LLC, ***if no attorney enters an appearance on its behalf by May 12, 2025, Lisa’s Priceless Pets, LLC shall be in default, and the Clerk shall enter default against it pursuant to Federal Rule of Civil Procedure 55(a)***” (Dkt. No. 27, emphasis added).
8. As of the date of this filing, no attorney has entered an appearance on behalf of Defendant Priceless Pets. Thus, Priceless Pets is in default, and we respectfully request that the Clerk comply with this Court’s order that the “Clerk shall enter default against it pursuant to Federal Rule of Civil Procedure 55(a)” (*Id.*).

9. Priceless Pets is a limited liability company, and therefore, not an infant, in the military or an incompetent person.

10. Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct

SIGNED on this the 27<sup>th</sup> Day of May, 2025.

  
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David J. Goldsmith, Esq.